BETHANY L. COLEMAN-FIRE, OSB #113574 bethanycolemanfire @dwt.com DAVIS WRIGHT TREMAINE LLP 1300 S.W. Fifth Avenue, Suite 2400 Portland, Oregon 97201-5610 Telephone: (503) 241-2300

Attorneys for Plaintiff

ELLEN F. ROSENBLUM Attorney General VANESSA A. NORDYKE, OSB #084339 Assistant Attorney General Department of Justice 1162 Court Street NE Salem, OR 97301-4096 Telephone: (503) 947-4700

Telephone: (503) 947-4700 Facsimile: (503) 947-4792

Facsimile: (503) 778-5299

Email: Vanessa.A.Nordyke@doj.state.or.us

Attorneys for Defendants Shelton and Gulick

IN THE UNITED STATES DISTRICT COURT DISTRICT OF OREGON

EDWARD ANDREW THOMAS,

PLAINTIFF,

V.

MARK NOOTH, Superintendant, SRCI, DR. SHELTON, Medical Director for DOC, Dr. EVANS, Clinical Mental Health Services (EOCI), DARRIN CHRISTOFFERSON B.S. Mental Health Case Manager, DR. GULICK, Practitioner,

DEFENDANTS.

Case No. 2:14-CV-64-KI

STIPULATED MOTION TO DISMISS WITHOUT PREJUDICE

Plaintiff and Defendants hereby stipulate that all claims are hereby dismissed without prejudice. Plaintiff is not precluded on the basis of issue or claim preclusion from seeking future relief related to his medical treatment or status.

IT IS SO STIPULATED this 25 day of September, 2015.

DAVIS WRIGHT TREMAINE LLP

By s/ Bethany L. Coleman-Fire

Bethany L. Coleman-Fire, OSB #113574

Attorneys for Plaintiff

DEPARTMENT OF JUSTICE

Ву

Vanessa A. Nordyke, OSB #084339

Attorneys for Defendants Shelton and Gulick